




INTEROFFICE CORRESPONDENCE

DATE: January 16, 1995

TO: T. G. Hedahl, Waste Management, Bldg. 111. X2272

FROM: S. G. Stiger, Environmental Restoration, Bldg. 080, X8540 

SUBJECT: CERTIFICATION OF OPERABLE UNIT 2 FIELD TREATABILITY UNIT FOR FILTER CAKE
SLUDGE - SGS-643-94

DOE Order: 5400.1

Action: None required.

The Operable Unit (OU) 2 Closure Team is in the process of obtaining approval to ship filter cake sludge generated at the Field Treatability Unit (FTU) to ENVIROCARE of Utah. Since the commencement of FTU operations in 1992, 319 drums of filter cake sludge have been generated. Prior to shipment activities commencing, the Resource Conservation and Recovery Act (RCRA) requires certification by an authorized representative that the treatment process has been operated and maintained properly in order to comply with applicable performance standards. Dennis W. Pontius and Michael T. Vess of Environmental Restoration Program Division (ERPD) will be providing certification based on their experience and familiarity with both operations and maintenance of the FTU. Dennis W. Pontius supervised FTU operations from April 27, 1992 to March 1, 1993 while Michael T. Vess has been supervising FTU operations since March 1, 1993. Each individual will be certifying the performance of the FTU only for the period of time for which they were supervising unit operations. Per requirements mandated in the Code of Federal Regulations (CFR), 40 CFR 268.7(a)(5)(i), the certification will state the following:

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information. I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR part 268, subpart D, and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d) with impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

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Additionally, certification that the waste complies with the Land Disposal Restrictions (LDR), mandated by RCRA, will be required prior to obtaining approval from ENVIROCARE for waste shipment. This certification will be provided by Laurie Gregory-Frost or Gary D. Guinn of Environmental Operations Management group. Per requirements mandated in 40 CFR 268.7 (a)(2)(i)(B), the certification will read as follows:

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification and the waste complies with the treatment standards specified in 40 CFR part 268, subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

As stated in 40 CFR 268.7(a)(5)(i), the treatment process certification shall be submitted to the land disposal facility (ENVIROCARE) with each shipment of filter cake sludge. The certification for LDR compliance will be necessary for the initial shipment to ENVIROCARE. This certification will apply to the 319 drums currently in storage. Future certification for LDR compliance will be provided with additional sampling activities.

If you have any further questions or require additional information, please call Laurie Gregory-Frost at extension 8570.

JRB:bll

cc:

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C. L. Ferrera
L. A. Gregory-Frost *LF*
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ERPD Project File (2)